

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CURTIS WRIGHT, #206-095

*

Plaintiff,

*

v.

*

Civil No. MJG-02-3843

THOMAS CORCORAN, ET AL.,

*

Defendants.

*

* * * * *

MOTION FOR EXTENSION OF TIME

Defendant, Thomas Corcoran, by his attorneys, J. Joseph Curran, Jr., Attorney General of Maryland, and Stephanie Lane-Weber, Assistant Attorney General, moves, pursuant to Fed.R.Civ.P. 6(b)(1), for an extension of time to and including September 11, 2005, to file a response to the complaint filed in the above-captioned case for the following reasons:

1. By Order dated July 29, 2005, this Court granted the Defendants an extension of time to and including August 28, 2005, within which to file a response to the complaint.

2. Due to undersigned counsel being out of town, additional time is needed so that the Defendant can prepare and file a detailed response.

3. An additional two week period to and including September 11, 2005 within which to respond to the Complaint should be sufficient to prepare Defendant's initial pleadings.

4. This Motion is not made for purposes of delay.

WHEREFORE, it is respectfully requested that this Court grant leave for Defendant Thomas Corcoran, to file a response in the instant case on or before September 11, 2005.

Respectfully submitted,

J. JOSEPH CURRAN, JR.
Attorney General of Maryland

/s/
STEPHANIE LANE-WEBER
Assistant Attorney General
General Bar No. 00023

St. Paul Plaza - 19th Floor
200 St. Paul Place
Baltimore, Maryland 21202
(410) 576-6340 (Telephone)
(410) 576-6880 (Telefax)

Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of August, 2005, a copy of the foregoing Motion for Extension of Time was mailed, postage prepaid, to:

Curtis Wright, #206-095
Maryland Correctional Adjustment Center
401 East Madison Street
Baltimore, Maryland 21202

/s/

STEPHANIE LANE-WEBER
Assistant Attorney General

G:\LANEWEBS\WPDATA\WRIGHT 3843\Pleadings\met3.wpd